



Jacob A. Goldberg, Esq.
jgoldberg@rosenlegal.com

January 31, 2023

VIA ECF

Honorable John G. Koeltl
United States District Judge
United States District Court for the Southern District of New York
500 Pearl Street
New York, NY 10007-1312

Re: ***Brennan v. Latch, Inc. f/k/a TS Innovation Acquisitions Corp.***
No. 1:22-cv-07473-JGK-GWG

Dear Judge Koeltl:

We represent Lead Plaintiff VB PTC Establishment as Trustee of Gersec Trust (“Gersec Trust”) in this securities class action.

On October 31, 2022, the Court excused Defendant Latch, Inc. (“Latch” or “Company”) from responding to the initial complaint, ordering the parties to confer on and submit a proposed schedule for the filing of an amended complaint and for Latch’s response thereto within fourteen days of the Court’s appointing a lead plaintiff and approving lead counsel (Dkt. No. 27). By Order dated January 17, 2023, after a hearing on the same day (“Hearing”), this Court appointed as Lead Plaintiff the Gersec Trust, approving this firm as Lead Counsel. (Dkt. No. 44). The deadline for submitting to the Court the proposed schedule upon which the parties agree is January 31, 2023.

At the Hearing, the parties informed the Court that Latch had yet to restate its financial statements and that filing an amended complaint before the Company restated would likely necessitate another amendment upon the publication of the restatement. We have conferred with Latch’s counsel about the proposed schedule. The parties request that the Court permit them to postpone filing a proposed schedule.

Latch's counsel informs that the restatement process will likely take several more months. Lead Plaintiff commits to filing an amended complaint no later than twenty-one days after Latch publishes the restatement. In addition, counsel will communicate and coordinate, submitting a schedule as soon as possible. Lead Plaintiff will update the Court on March 30, 2023, about the status of Latch's restatement and the schedule the parties propose, if any.

If the Court has any questions, we stand ready to answer.

Respectfully submitted,

/s/ Jacob A. Goldberg

Jacob A. Goldberg

cc: All counsel of record (via ECF)